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**From:** Linda T. Landis [linda.landis@eversource.com]  
**Sent:** 11/17/2017 9:25:20 PM  
**To:** Stein, Mark [Stein.Mark@epa.gov]  
**CC:** William H. Smagula [william.smagula@eversource.com]; Elizabeth H. Tillotson [elizabeth.tillotson@eversource.com]; Webster, David [Webster.David@epa.gov]  
**Subject:** RE: Request for Extension of the Comment Period

Attorney Stein: Public Service Company of New Hampshire d/b/a Eversource Energy ("PSNH") requests a two-week extension to the December 4<sup>th</sup> close of the public comment period on EPA's Statement of Substantial New Questions pertaining to the draft NPDES permit for Merrimack Station. As we briefly discussed, the end-of-year divestiture of our fossil plants and the pending transition to new ownership have taken up significantly more staff time than originally anticipated. As a result, and with accelerated divestiture activities this past month, our already limited resources have been seriously taxed. Because this state-mandated divestiture is unique, it truly was impossible for those of us in Generation to foresee the demands on our time that would be required by this process.

We also would like to provide the buyer of the plants, Granite Shore Power LLC, the necessary time to review a draft of our comments.

Thank you for considering this request. Linda

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**From:** Stein, Mark [mailto:Stein.Mark@epa.gov]  
**Sent:** Friday, November 17, 2017 10:20 AM  
**To:** Linda T. Landis <linda.landis@eversource.com>  
**Cc:** Webster, David <Webster.David@epa.gov>  
**Subject:** Request for Extension of the Comment Period

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Hi Linda –

This email follows up on your phone call indicating the Eversource would like to request an extension of the current comment period that is underway for the Merrimack Station NPDES permit. You explained to me that Eversource feels that more time is reasonably needed due to circumstances related to the concurrent nature of the comment period with the state-law-mandated divestiture process under which Eversource is currently in the process of selling Merrimack Station (and other generating facilities). In any event, I mentioned that it would probably make sense for you to send a written request for the extension, but that I would first identify the issue to the Permits Office here in Region 1 and then let you know. I have done so and the Permits Office would indeed like to receive an extension request in writing. In that written request, you can explain why you feel a time extension is reasonable and appropriate under the present circumstances. Then EPA Region 1 can consider your request and make a determination about whether or not an extension of time should be implemented. If we extend the comment period, we will, of course, do so for all potential commenters.

Please let me know if you have any questions about this.

Thanks for your cooperation.

- Mark

Mark A. Stein  
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